



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GA 30303-8960

January 28, 2002

4WD/FFB

Commanding Officer
Attn: Jim Reed
Code 1872
SOUTHNAVFACENGCOM
2155 Eagle Drive
North Charleston, South Carolina 29419-9010

Subject: Corrective Measure Study Work Plan Northside Loess Soil and Groundwater,
Revision: 2, Naval Support Activity Mid-South, Millington, Tennessee

Dear Mr. Reed,

The Environmental Protection Agency (EPA) has completed review of Corrective Measure Study Work Plan Northside Loess Soil and Groundwater, Revision: 2. In general the document looks good. A few questions and comments are enclosed.

If you would like to discuss these comments or have questions please contact me at 404-562-8513.

Sincerely,

A handwritten signature in cursive script, reading "Jennifer Herndon", is written over a horizontal line.

Jennifer Herndon
Remedial Project Manager

cc: Rob Williamson, Public Works Office
Jim Morrison, TDEC - Memphis
Clayton Bullington, TDEC - Nashville
John Stedman, Ensafe - TOM
Jack Carmichael, USGS

Corrective Measure Study Work Plan Northside Loess Soil and Groundwater, Revision: 2
Naval Support Activity Mid-South, Millington, Tennessee.

Specific Comments

Page 3-27. The text states that the TDEC cleanup standard for benzene in the loess groundwater at the site is 70 ug/L which is based on non-drinking water classification for site-specific groundwater. How was the standard derived? What site specific criteria was used? The target standard of 70 ug/L is discussed here but the MCL for benzene (5 ug/L) is referred to later in the section and is noted in Table 3-9. The MCL for benzene is the appropriate cleanup goal.

Page 3-29. A voluntary correction action was conducted at SWMU 5. Samples were collected from FFMW-8 to confirm no exceedences from this well. It is stated that copies of lab reports are included in Appendix E. The reports were not included in my document.

Page 4-13. The text lists the parameters that will be monitored to determine the potential for natural biodegradation. It is recommended that specific conductivity and temperature be added to the list.